

*Fee paid \$25*  
*E641835*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
NANCY GREENHILL,

Plaintiff,

-against-

THE SUDDATH COMPANIES, d/b/a  
SUDDATH RELOCATION SYSTEMS OF  
NEW YORK, INC.,

Defendant.  
-----X

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

08 Civ. 0966 (KMK)

ECF Case

FILED  
U.S. DISTRICT COURT  
S.D.N.Y. W.P.  
MAR 17 P 2:37

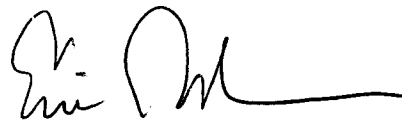
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Eric L. Gordon, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

William H. Andrews, Esq.  
Coffman, Coleman, Andrews & Grogan, P.A.  
P.O. Box 40089  
Jacksonville, Florida 32203  
Telephone 904-389-5161  
Facsimile 904-387-9340  
wandrews@ccaglaborlaw.com

William H. Andrews, Esq., is a member in good standing of the Bar of the State of Florida and in the United State District Court for the Middle District of Florida. There are no pending disciplinary proceeding against William H. Andrews in any State or Federal Court.

Dated: White Plains, New York  
March 13, 2008

By



Eric L. Gordon (EG 7301)  
Attorneys for Defendant  
445 Hamilton Avenue, 15<sup>th</sup> Floor  
White Plains, New York 10601  
(914) 946-4777

SEARCHED	INDEXED
SERIALIZED	FILED
MAR 17 2008	
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ELECTRONICALLY FILED	
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STATE OF NEW YORK

)

)SS.:

COUNTY OF WESTCHESTER

)

**AFFIDAVIT IN SUPPORT OF**  
**MOTION TO ADMIT**  
**COUNSEL PRO HAC VICE**

08 Civ. 0966 (KMK)

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**ERIC L. GORDON**, being duly sworn, deposes and says:

1. I am a member of Keane & Beane, P.C., and local counsel for Defendant, the Suddath Companies, d/b/a, Suddath Relocation Systems of New York, Inc., in the above-captioned action. I am familiar with the proceedings in this case. I make this Affidavit based on my personal knowledge of the facts set forth herein and my discussions with William H. Andrews, Esq., in support of Defendant's motion to Admit William H. Andrews, Esq., as counsel pro hac vice to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in April 1994. I am also admitted to the bar of the United State District Court for the Southern District of New York, and am in good standing with this Court.

3. I am familiar with William H. Andrews, Esq. Mr. Andrews is a member of the firm Coffman, Coleman, Andrews & Grogan, P.A., located in Jacksonville, Florida. I am informed and believe that Mr. Andrews is a skilled attorney who has extensive practice in Federal Courts and is familiar with the Federal Rules of Civil Procedure. Mr. Andrews has been a practicing attorney since 1972 and is a charter member of the Florida Academy of Management Attorneys. I am informed and believe that he also has extensive experience in regard to employment related matters, which are at issue in this case.

4. Accordingly, I am pleased to move the admission of William H. Andrews, Esq., pro hac vice.

5. I respectfully submit a proposed Order granting the admission of William H. Andrews, Esq., pro hac vice.

**WHEREFORE**, it is respectfully requested that the motion to admit William H. Andrews, Esq., pro hac vice, to represent Defendant in the above-captioned matter, be granted.

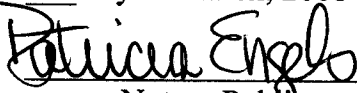
Dated: White Plains, New York  
March 13, 2008

**KEANE & BEANE, P.C.**

By: \_\_\_\_\_

Eric L. Gordon (EG 7301)  
Attorneys for Defendant  
445 Hamilton Avenue, 15<sup>th</sup> Floor  
White Plains, New York 10601  
(914) 946-4777

Sworn to before me this  
13<sup>th</sup> day of March, 2008

  
Notary Public

**PATRICIA A. ENGELS**  
Notary Public, State of New York  
No. 01EN6138621  
Qualified in Westchester County  
Commission Expires 12/27/20 09

AO 136 (Rev.9/98) Certificate of Good Standing

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**UNITED STATES DISTRICT COURT**  
**MIDDLE DISTRICT OF FLORIDA**

**CERTIFICATE OF GOOD STANDING**

*I, Sheryl L. Loesch , Clerk of this Court,*  
*certify that William Henry Andrews, Bar # 0145660,*  
*was duly admitted to practice in this Court on*  
*July 20, 1973, and is in good standing*  
*as a member of the Bar of this Court.*

*Dated at Jacksonville, Florida, on March 6, 2008.*

SHERYL L. LOESCH  
CLERK

  
DEPUTY CLERK

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NANCY GREENHILL,

Plaintiff,

-against-

THE SUDDATH COMPANIES, d/b/a  
SUDDATH RELOCATION SYSTEMS OF  
NEW YORK, INC.,

Defendant.  
-----X

STATE OF NEW YORK )

)SS.:

COUNTY OF WESTCHESTER )

**AFFIDAVIT OF SERVICE**

08 Civ. 0966 (KMK)

ECF Case

Patricia Engels, being duly sworn, deposes and says:


I am not a party to this action, am over 18 years of age and reside at c/o Keane & Beane, P.C., 445 Hamilton Avenue, 15<sup>th</sup> Floor, White Plains, New York 10601.

On the 14<sup>th</sup> day of March, 2008, I served a true copy of the annexed MOTION TO ADMIT COUNSEL PRO HAC VICE WITH SUPPORTING AFFIDAVIT in this action by mailing a true copy thereof enclosed in a post-paid wrapper, by first class mail, by depositing same in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State to the following address:

To: Helen Ullrich, Esq.  
Bergstein & Ullrich, LLP  
15 Railroad Avenue  
Chester, NY 10918

  
\_\_\_\_\_  
PATRICIA ENGELS

Sworn to before me this  
14<sup>th</sup> day of March, 2008

  
\_\_\_\_\_  
Notary Public

MARIANNE QUATTROCIOCCI  
Notary Public, State of New York  
No. 4995957  
Qualified in Westchester County  
Commission Expires May 4, 199

2010